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January 19, 2024

Hon. Andrew L. Carter, Jr.
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Adeia Guides Inc. et al. v. Shaw Cablesystems G.P. et al.*
Case No.: 1:23-cv-08796-ALC
Motion for Leave to Redact Portions of Adeia's Response to Shaw's Pre-Motion Letter

Dear Judge Carter:

We represent Plaintiffs Adeia Guides Inc., Adeia Media Solutions Inc., and Adeia Media Holdings LLC (collectively, "Adeia") in the above-referenced action. Pursuant to Your Honor's Individual Practice Rule 6(D), Adeia respectfully requests leave to file Adeia's Response to Shaw's Pre-Motion Conference Letter on its anticipated motion to dismiss ("Response Letter") under seal, and publicly file the Response Letter with proposed redactions, including quotes from, and summaries of, the Interactive Program Guide Patent License Agreement (previously filed under seal at Dkt. 1-1).

Adeia has good and sufficient cause to redact portions of its Response Letter that quote or refer to confidential business information contained in the IPG Agreement, which this Court has previously ordered to be filed under seal. Dkt. 3. Adeia's proposed redactions to the Response Letter are also narrowly tailored to protect truly confidential information in order to protect the public's interest in accessing judicial documents.

Adeia respectfully requests that Your Honor grant leave to file redacted portions of the Response Letter.

IRELL & MANELLA LLP

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Respectfully submitted,



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